

Hearing Date and Time: April 14, 2010 at 10:00 a.m. (Prevailing Eastern Time)
Objection Date and Time: April 7, 2010 at 4:00 p.m. (Prevailing Eastern Time)

Bart A. Houston, Esq.
Robert F. Elgidely, Esq.
GENOVESE, JOBLOVE & BATTISTA, P.A.
PNC Bank Building
200 East Broward Boulevard, Suite 1110
Fort Lauderdale, Florida 33301
(954) 453-8000 (tel.)
(954) 453-8010 (fax)

Counsel to Coscan Construction, LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re:	:
	:
LEHMAN BROTHERS HOLDINGS, INC., <u>et al.</u> ,	:
	:
Debtors.	:
-----X	

Chapter 11
Case No. 08-13555 (JMP)
(Jointly Administered)

**NOTICE OF MOTION OF COSCAN CONSTRUCTION, LLC
FOR RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that a hearing shall be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling Green, New York, New York 10004 (the "Bankruptcy Court"), on **April 14, 2010 at 10:00 a.m.** (Prevailing Eastern Time), or as soon thereafter as counsel may be heard (the "Hearing") to consider the Motion for Relief from the Automatic Stay filed by COSCAN CONSTRUCTION, LLC, (hereinafter the "Motion").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with

the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) counsel for the Debtors and Debtors in Possession, Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq., and Jacqueline Marcus, Esq); (iii) the Office of the United States Trustee, 33 Whitehall Street, 21st Floor, New York, NY 10004-2111 (Attn: Andrew D. Velez-Rivera, Esq.); (iv) counsel for Coscan Construction, LLC, Genovese, Joblove & Battista, P.A., PNC Bank Building, 200 East Broward Boulevard., Suite 1110, Fort Lauderdale, Florida 33301 (Attn: Bart A. Houston, Esq. and Robert F. Elgidely, Esq.) and (v) all other parties identified in the accompanying Affidavit of Service; so as to be received no later than **April 7, 2010 at 4:00 p.m.** (Prevailing Eastern Time) (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without notice to any creditor or other party in interest other than by announcement of the adjourned date in open court on the date of the Hearing.

Dated: March 3, 2010
Fort Lauderdale, Florida

Respectfully submitted,

GENOVESE, JOBLOVE & BATTISTA, P.A.

By: /s/ Robert F. Elgidely

Robert F. Elgidely, Esq. (RE-0512)

Bart A. Houston, Esq.

PNC Bank Building

200 East Broward Boulevard, Suite 1110

Ft. Lauderdale, Florida 33301

Telephone: (954) 453-8000

Telecopier: (954) 453-8010

Counsel to Coscan Construction, LLC